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COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSICA SOSA GUZMAN, an individual,

Plaintiff

vs.

COSTCO WHOLESALE CORPORATION,
a foreign corporation dba COSTCO,
DOE EMPLOYEES I through X, and
ROE BUSINESS ENTITIES I through X
inclusive,

Defendant

CASE NO.: 2:22-cv-02070-CDS-BNW

STIPULATION AND ORDER TO
CONTINUE TRIAL
PENDING COMPLETION OF
SETTLEMENT CONFERENCE
(First Request)

[ECF No. 23]

Plaintiff, JESSICA SOSA GUZMAN (hereinafter referred to as “Ms. Guzman” or
“Plaintiff”), by and through counsel, Kevin Hansen, Esq. and Amanda Harmon, Esq. of the Law
Offices of Kevin R. Hansen, and Defendant, COSTCO WHOLESALE CORPORATION
(hereinafter referred to as “Costco”), by and through counsel, Edgar Carranza, Esq. and Megan E.

1 Wessel, Esq. of the law firm MESSNER REEVES LLP, hereby submit the instant stipulation and
2 order to continue the trial date from May 21, 2024 to June 17, 2024 pursuant to Local Rule 7-1 as
3 follows:

4 1. On November 8, 2022, Plaintiff filed her Complaint against Costco with the Eighth
5 Judicial District Court for Clark County, Nevada.

6 2. On December 1, 2022, Costco filed its Answer denying Plaintiff's allegations and
7 denying all liability for the injuries.

8 3. On December 14, 2022, Costco filed its Petition of Removal and removed the matter
9 to this Court based upon diversity jurisdiction. [Doc No. 1]. On January 19, 2023, Costco filed its
10 Statement Regarding Removal. [Doc. No. 10].

11 4. The parties participated in the Fed. R. Civ. P. 26(f) conference on December 28,
12 2022, and filed their proposed Joint Discovery Plan and Scheduling Order which was entered by this
13 Court on January 11, 2023. [Doc. No. 8].

14 5. The Parties have been engaged in discovery. Initially, they exchanged their
15 respective Fed. R. Civ. P. 26 disclosures, and subpoenaed applicable medical records and billing. In
16 addition, the Parties served multiple sets of written discovery requests to each other, all of which
17 have been responded to. Depositions of the Parties have been completed.

18 6. On November 13, 2023, Costco filed its Motion for Summary Judgment. [Doc. No.
19 19]. Plaintiff filed her Opposition on December 3, 2023 [Doc. No. 20] and Costco filed its Reply on
20 December 18, 2023. [Doc. No. 22]. The motion has not yet been ruled on.

21 7. On January 4, 2024, this Court entered the Joint Pretrial Order **setting trial for July**
22 **29, 2024 at 9:30 am.** [Doc. No. 23].

23 8. On January 11, 2024, this Court issued a Minute Order referring this case to a
24 Settlement Conference before U.S. Magistrate Judge Brenda Weksler. [Doc. No. 24]. On February
25 28, 2024, an Order Scheduling Settlement Conference was served setting the same for April 17,
26 2024, at 10:00 am. [Doc. No. 25].

1 9. On April 8, 2024, a Minute Order was issued continuing the Settlement Conference to
2 May 21, 2024, at 10:00 am and setting the Pre-Settlement Conference for May 20, 2024, at 3:00 pm
3 and requiring settlement briefs to be submitted by May 14, 2024, at 4:00 pm. [Doc No. 26]. Costco
4 was unavailable on the May 21, 2024, setting for the Settlement Conference.

5 10. As a result, the Parties submitted, and this Court entered, a Stipulation and Order to
6 Continue Settlement Conference to **August 23, 2024**.

7 11. The August 23, 2024, date for the Settlement Conference is 23 days after the trial in
8 this matter is scheduled to begin. Accordingly, the Parties agree and hereby submit the instant
9 Stipulation and Order seeking to continue the July 29, 2024, trial date to allow the Settlement
10 Conference to be completed.

11 12. The Parties estimate trial will require a total of 5-7 full days to complete, not including
12 *voir dire*.

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13. The Parties have met, conferred and jointly offer the following three dates for the new trial setting:

- a. February 3, 2025
- b. February 17, 2025
- c. March 10, 2025

DATED this 4th day of June, 2024

DATED this 4th day of June, 2024.

MESSNER REEVES, LLP

Law Office of Kevin R. Hansen

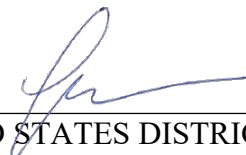
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 JESSICA SOSA GUZMAN

ORDER

Based on the parties' stipulation, it is ordered that the calendar call presently scheduled for July 18, 2024, at 10:00 a.m., is vacated and continued to February 27, 2025 at 9:30 a.m.; and the trial presently scheduled for July 29, 2024, at 9:30 a.m., is vacated and continued to March 10, 2025 at 9:30 a.m. in courtroom 6B.

Dated: June 11, 2024


 UNITED STATES DISTRICT JUDGE